

Patrick W. Turner General Counsel-South Carolina Legal Department

AT&T South Carolina 1600 Williams Street Suite 5200 Columbia, SC 29201

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April 24, 2008

The Honorable Charles Terreni Chief Clerk of the Commission Public Service Commission of South Carolina Post Office Drawer 11649 Columbia, South Carolina 29211

> AT&T South Carolina's Petition Requesting the Commission's Re: Intervention in NANPA NXX Code Assignments Docket No.

Dear Mr. Terreni:

BellSouth Telecommunications Inc. d/b/a AT&T South Carolina ("AT&T South Carolina") respectfully encloses for filing a Petition for Review of NXX Code Denial in the Seneca Rate Center in the above-captioned matter.

By copy of this letter, I am serving a copy of this document on NANPA, NeuStar, and the ORS, as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nml Attachment 709890

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

In Re:	AT&T SOUTH CAROLINA'S)
	PETITION REQUESTING THE COMMISSION'S	DOCKET NO
	INTERVENTION IN NANPA NXX CODE)
	ASSIGNMENTS)

PETITION FOR REVIEW OF NXX CODE DENIAL IN THE SENECA RATE CENTER

BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina ("AT&T South Carolina"), pursuant to rules adopted by the Federal Communications Commission ("FCC") for challenging determinations of the North American Numbering Plan Administration ("NANPA"), petitions the Public Service Commission of South Carolina ("Commission") for review of NANPA's denial of AT&T South Carolina's application for use of central office code numbering resources in the 864 area code. The denial that is the subject of this Petition impacts AT&T South Carolina customer Duke Energy Corporation.

In support of this petition AT&T South Carolina states:

- 1. AT&T South Carolina is a telephone utility that provides certain services that are regulated by the Commission. Among other things, it provides intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Seneca exchange.
- 2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP"). See 47 C.F.R. § 52.13 (a), (b).

- 3. On March 31, 2000, the FCC issued a Report and Order and Further Notice of Proposed Rule Making relating to numbering resource optimization ("FCC 00-104"). The goal of FCC 00-104 was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers under the NANP.
- 4. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant's rate center will be exhausted within six months of the application. The FCC reaffirmed this requirement in two subsequent orders. FCC 00-429 at ¶ 29 (rel. Dec. 29, 2000); FCC 01-362 at ¶¶ 48-49 (rel. Dec. 28, 2001). Prior to this ruling, the Central Office Code Assignment Guidelines, used by the industry and NANPA to make code assignments, required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.
- 5. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center. FCC 00-429 at Paragraph 22; FCC 01-362, ¶¶ 50-52. The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources. *Id*.

- 6. On March 31, 1008, AT&T South Carolina's customer requested five thousand additional numbers in the range of 2000 through 6999. *See* Exhibit A.¹ On or about April 11, 2008, AT&T South Carolina submitted a Pooling Administration System request to NANPA and NeuStar for the assignment of the ten thousand number block in either the (864) 883, or 887 or 894 NXX to go with the customer's existing dialing plan in the Seneca, South Carolina exchange. The requested number blocks are needed to meet the numbering demands of Duke Energy at its Oconee Nuclear Station. As AT&T South Carolina does not have the existing numbers to meet the customer's request, it is requesting that the numbers be assigned to it.
- 7. AT&T South Carolina's application was completed in accordance with Industry Numbering Committee's (INC's) and/or NANPA's guidelines, and AT&T South Carolina filled out the necessary Month-to-Exhaust Certification Worksheets as required.
- 8. At the time of the filing of the Code request, the Seneca Rate Center had an MTE of 9.43 months and a utilization of 74.854 %. *See* Exhibit B.
- 9. Thereafter, also on April 11, 2008, NANPA's Central Office Code Administration denied AT&T South Carolina's request because AT&T South Carolina had not met the rate center based MTE criterion now set forth in the Central Office Code (NXX) Guidelines. NANPA denied AT&T South Carolina's code requests despite the fact that AT&T South Carolina does not have adequate numbering resources needed to satisfy this customer's demands in the Seneca Rate Center. NANPA's response is also included as part of Exhibit B.

Although the customer suggested an NXX of 884, that NXX is not available. Additionally, because the customer is only requesting the assignment of the five thousand number block (2000-6999), AT&T South Carolina intends to return the remaining number blocks (0000, 1000, 7000, 8000 and 9000) to the Pool for reassignment. See Exhibit B.

- 10. AT&T South Carolina's inability to provide this important customer with the requested numbers prevents AT&T South Carolina from providing the quality of service this customer desires, needs, and expects. If AT&T South Carolina is not assigned the NXX number blocks needed to meet the customer's request, AT&T South Carolina will be unable to provide telecommunications services requested by its customer. NANPA's refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources," FCC 00-429 at ¶ 61.
- 11. Both the FCC's rules and the Central Office Code (NXX) Assignment Guidelines provide that state regulatory authorities have the power and authority to review NANPA's decision to deny a request for numbering resources. See FCC 01-362, Appendix A, Final Rules, § 52.15(g) (4) ("The carrier may challenge the NANPA's decision to the appropriate state regulatory commission"); FCC 01-362 at ¶¶ 61-66; Central Office Code (NXX) Assignment Guidelines § 13.0 ("Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body").
- 12. Prior to the FCC's Order and the resulting change in the Central Office Code (NXX) Assignment Guidelines, the MTE procedures used by NANPA permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider's inventory did not have a block of sequential numbers large enough to meet

the customer's specific request. Under today's procedures, NANPA looks at the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief "if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory." FCC 01-362, ¶ 64. In addition, the FCC has ruled that, "States...may grant requests for customers seeking contiguous block of numbers." *Id*.

- 13. AT&T South Carolina requests that the Commission reverse NANPA's decision to withhold numbering resources from AT&T South Carolina because that decision interferes with AT&T South Carolina's ability to provide telecommunication services to its customers as required under South Carolina law.
- 14. This Commission (see Docket No. 2002 –185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review NANPA denials and to order the release of number resources to AT&T South Carolina to meet customer needs.

WHEREFORE, AT&T South Carolina requests that the Commission:

- 1. Reverse the decision of NANPA to deny AT&T South Carolina's request for additional numbering resources;
- Direct NANPA to provide the ten thousand number blocks in either the (864) 883, or 887 or 894 NXX to go with the customer's existing dialing plan in the Seneca, South Carolina Rate Center; and

3. Grant the requested relief as soon as possible.

Respectfully submitted this 27 day of April, 2008.

Patrick W. Turner

Suite 5200

1600 Williams Street

Columbia, South Carolina 29201

(803) 401-2900

ATTORNEY FOR SOUTH CAROLINA

709784

EXHIBIT A



Duke Energy Corporation Telecommunications 401 South College Street P O. Box 1008 Charlotte, NC 28201

Office Phone 704-382-9988 FAX 704-382-4800

March 31, 2008

Tommy L. Mull College Street CS03A PO Box 1008 Charlotte, NC 28201-1008

To: David Browne

Subject: New Numbers for Oconee Nuclear Station

Per our conversation, I need five thousand additional numbers at the Duke Energy Oconee Nuclear Station (existing service 864-885-3000). The number range should be from 2000 through 6999. Suggested NPA NXX 884.

Sincerely, Tommy Mull Senior Telecom Analyst Duke Energy IM/Telecommunications

EXHIBIT B

Pooling Administration System aida.armesto@att.com (SP) Sign Out Time: 04/11/2008 01:09:26 PM EDT Ŋ Printable Version ⊕ ֆ∐Individual Block Requests Central Office Code (NXX) Assignment Request Part 1 December 9, 2005 Requests Tracking In Service 864-SENECA-SC-204923 Number: 🛨 🖺 Donate Blocks **Full NXX: Dedicated** Customer + 🖺 Search Forms Type of + 🖺 Reports Delete Change 1 Application: + िUser Profile 1.0 GENERAL INFORMATION 1.1 Contact Information: Code Applicant: Company/Entity BELLSOUTH SO BELL Name: Headquarters 2600 Camino Ramon Address: City, State, Zip: San Ramon, CA, 94583 Contact Name: Aida Armesto Contact 600 NW 79 Ave Address: City, State, Zip: Miami, FL, 33182 305-260-8205 FAX: 305-264-2918 E-Phone: mail: aida.armesto@att.com Code Administrator:² Name: Michael Ortega Address: 46000 Center Oak Plaza City, State, Zip: Sterling, VA, 20166 Phone: 571-434-5348 FAX:571-434-5502 **1.2** NPA: **864** NXX:³ OCN:49417 LATA: 430 Parent Company's OCN(s) 9400 Switching Identification(Switch Entity/POI) 5SENCSCMA88E Rate Locality/City/Wire Center: Center: 6SENECA **Tandem Homing** Homing Tandem Operating Co: 7BST CLLI8: GNVLSCDT60T 1.3 Dates: Date of Request Effective Date:9 10 Application:04/11/2008 06/23/2008 Request Expedited Treatment? Yes No Χ a) Type of company/entity requesting the code: Incumbent Local Exchange Carrier (ILEC) (LEC, IC, CMRS, Other) b) Types of service: Wireline (e.g., Cellular - Type 2) c) Code Assignment Preference (Optional) **CUSTOMER SPECIFICALLY REQUESTS 864-NXX=883,887 OR 894**

- d) Codes that are undesirable, if any
- e) Type of change(Mark all that apply)

OCN-Intra-company¹¹ Switching Id Rate Center Tandem

Homing CLLI

OCN-Inter-company¹² Effective Date LATA Extend Reservation

Type of Request (Initial, growth, etc.)

If an initial code, attach(1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: 13 Yes Nο

1.6 NPA Jeopardy Criteria Apply: Yes No

1.7 Code request for new service (Explain): REQUESTING FULL CODE ON BEHALF OF THE PA. CUSTOMER IS REQUESTING RANGE 2000 THRU 6999, BLOCKS 0,1 AND 7 THRU 9 WILL BE RETURNED TO THE POOL

for BIRRDS 14 15 1.8 Part 2 is attached Part 2 is not attached Additional Documentation is attached Additional Documentation is not attached

Comments:

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (http://www.atis.org/atis/clc/inc/incdocs.htm) as of the date of this application: 16

Associate Tech Support 04/11/2008 Aida Armesto Analyst Network Title Date Signature of Code Applicant

¹Identify type and reason for change(s) in Section 1.4(e).

²A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (973-884-8355) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior

assignment should direct questions regarding appropriate OCN usage to the Telcordia TM Routing Administration (TRA) on 732-699-6700.

⁵This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia TM COMMON LANGUAGE CLLITM Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

⁶Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

⁸This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLITM Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

⁹Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰Requests for code assignment should not be made more than six months prior to the requested effective date.

¹¹Select if you are the current Code Holder

¹²Select if you are not the current Code Holder

¹³The Applicant will indicate "YES" if the NXX being requested will be used for thousandsblock number pooling and will leave this field blank if it is not.

¹⁴Applicant is not required to submit Part 2 of the code request form if it is doing its own TelcordiaTM Business Integrate Routing and Rating Database System (BIRRDS) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

¹⁵WARNING! It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45 calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

¹⁶An incomplete form may result in delays in processing this request.

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Pooling Administration System Page 1 of 4 **Pooling Administration System** aida.armesto@att.com (SP) Sign Out Time: 04/11/2008 01:12:35 PM EDT βÌ Printable Version ⊕ **ந**∐ndividual Block TBPAG Attachment 1 - March 19, 2007 Requests + 国CO/NXX Code Requests Thousands-Block Application Form - Part 1A In Service **Tracking** 864-SENECA- Donate Blocks Donate Blocks Number: SC-204923 ⊕ 🖺 Submit Forecast **Full NXX**: 🛨 🖺 Search Forms **Dedicated** Customer ± 🖺 Reports ■ User Profile Type of New Change 1 Application: **Disconnect GENERAL APPLICATION INFORMATION** 1.1 Contact Information: **Block Applicant:** Company **BELLSOUTH SO BELL** Name: Headquarters 2600 Camino Ramon Address: City, State, San Ramon, CA, 94583 Zip: Contact Aida Armesto Name: Contact 600 NW 79 Ave Address: City, State, Zip: Miami, FL, 33182 Phone: 305- FAX: 305-264-E-mail: aida.armesto@att.com 260-8205 2918 Pooling Administrator:ii Contact **Dora Wirth** Name: Contact 1800 Sutter St Address: City, State, Zip: Concord, CA, 94520 925-363-8706 FAX: 925-363-7684 E-mail: dora.wirth@neustar.com 1.2 General Information: LRN needed iii Check one: No LRN needed Parent Company's OCN NPA: 864 LATA: 430 OCN:iv 9400 Number of Thousands-Blocks Requested: 10 Switching Identification(Switch Entity/POI): v SENCSCMA88E

Rate Center:vi

SENECA

City or Wire Center Name:

Rate Center Sub Zone:

1.3 Dates:

Requested Block Effective Date of Application: vii Date:viii 04/11/2008 06/23/2008 Request Expedited Treatment? (See Section 8.6) Yes No X

1.4 Type of Service Provider Requesting the Thousands-Block:

- a) Type of Service Provider: Incumbent Local Exchange Carrier (ILEC) (LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for :
- Thousands-Block(s) (NXX-X) assignment Preference (Optional) CUSTOMER SPECIFICALLY REQUESTS 864-NXX=883,887 OR 894
- Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any
- If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool)

1.5 Type of Request:

Initial block for rate center: Yes If Yes, attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center: Yes If Yes, attach months to exhaust worksheet Χ

Type of change(Mark all that apply)

OCN:Intra-companyix Switching Id Part 1B

OCN:Inter-company^x Effective Date

Change block: Yes If Yes, list NPA-NXX-X

1.6 Block Return:

- a) Is this block Contaminated Yes No
- b) If Yes how many TNs are NOT available for assignment:
- c) Have all new Intra SP ports been completed in the NPAC Yes No
- Has this block been protected from further assignment Yes No

Disconnect block: Yes If Yes, list NPA-NXX-X

Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (http://www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

> **Associate** Tech

Aida Armesto Support 04/11/2008

Analyst Network

Signature of Block Applicant Title Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia TM LERG TM Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia TM Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLITM tandem of the facilities based provider xi. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes:

Identify the type of change(s) in Section 1.5.

il The Pool Administrator is available to assist in completing these forms.

iiiA CO Code application will also need to be submitted to the PA.

ivOperating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

VThis is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM code of the switch /POI.

viRate Center name must be a tariffed Rate Center.

viiAcknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

viil Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).

ix Select if you are the current Block Holder.

x Select if you are not the current Block Holder

xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies,

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	Pooling Adm	inistration S	ystem	
nida.armesto@att.com (SP)		2008 01:14:02 PM EDT		•
				Printabl
Individual Block Requests	November 21, 2003			Attachment 3
୍ରାCO/NXX Code	ATIS-0300066.at3	a Adminintentaria Da	ananal antionat	ian
Requests ⊴Confirm Resources	roomig	Pooling Administrator's Response/Confirmation TBPAG Part 3		
In Service				
Donate Blocks	Tracking Number :	864-SENECA- SC-204923		
Submit Forecast		00-204323	_	
Search Forms	Date of Application:	04/11/2008	Effective Date:	
Reports	Date of Receipt:	04/11/2008	Date of Response:	04/11/2008
User Profile	·		_	
	Service Provider Name:	BELLSOUTH SO BELL		
	(Telcordia TM LERG TM	9417		
	Routing Guide) OCN:			
	NPAC SOA SPID :			
	NI AC SOA SPID.			
	Pooling Administrator C	Contact Information:		
	Dora Wirth	Phone:		925-363-8706
	Signature of Pooling Adm			
	Dora Wirth	Fax:		925-363-7684
	Name (print)			
	Email:	dora.v	virth@neustar.con	n
	NIDA NIVV NIDA			
	NPA-NXX or NPA- NXX-X :		Block Assigned	d:
			Block Reserved	
			Block Reservati	-
			Expiration Date:	
			Block/Code Mo	dified:
			Block/Code Disconnected :	
	Block Contaminated	(Yes or No) :	Biodomicolou :	·
		ber of TNs contaminated	d :	
	Switch Identification(S		SENCSCMA	
	Rate Center:	Switch Entity/F Oi).	SENECA	JOL
	Rate Center Sub Zon	ne.	<u> </u>	
	Nate Offici out Zon	ic.		
	X Form Complete, req	juest denied.		
	Explanation:			
	DR-00: You do not meet the MTE and/or Utilization requirements,			
	therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using			
	this Part 3 denial.	e waiver from the ap If you are in disagre	ement with the di	mmssion using sposition of this
	request, please re	efer to the Thousand	s'Block Number (1	XXX-X) Pooling
	request, please re	efer to the Thousand uidelines for the app	s'Block Number (1	NXX-X) Pooling

Pooling Administration System		Page 2 of 2
	Request withdrawn. Explanation:	
	Assignment activity suspended by the administrator. Explanation:	
	Remarks:	
	¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)	_
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Pooling Administration System

aida.armesto@att.com (SP)

Time: 04/11/2008 01:13:38 PM EDT

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ff ∰Individual Block Requests

- + 国CO/NXX Code Requests
- In Service
- ± ∰Donate Blocks
- ± 🖺 Submit Forecast
- ± 🖺 Reports
- User Profile

Appendix 3

August 6, 2001 MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level 1

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 864-SENECA-SC-204923

Date: 04/11/2008

OCN:9417

Company Name: BELLSOUTH SO BELL

Rate Center: SENECA

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):

Name of Block Applicant: Aida Armesto

Signature: Aida Armesto

Title: Associate Tech Support Analyst Network

FAX No.: 305-264-2918

Telephone No.: 305-260-8205

E-mail: aida.armesto@att.com

- A. Available Numbers: 10395
- B. Assigned Numbers: 36968
- C. Total Numbering Resources: 49387
- D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation:0

List Excluded

Code(s) or Block(s):

> Month #1 #2 #3 #4 #5 #6 #7 #8 #9 #10 #11 #12

E. Growth

History -Previous 6

220 196 183 61 92 864

months²

F. Forecast

- Next 12 5269 269 269 269 269 269 269 269 269 269 269 269 months³

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6):1102.333

H. Months

Numbers Available for Assignment to

Exhaust⁴

to

Customers(A)

Average Monthly Forecast(G)

Block Requested

Available Numbers

Months To Exhaust 9.43

10395

Utilization⁵ Assigned Numbers(B) - Excluded Numbers(D) 74.854

Total Numbering Resources(C)-Excluded Numbers(D)

Explanation:

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¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

³Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁴To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

⁵Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))

Pooling Administration System aida.armesto@att.com (SP) Sign Out Time: 04/11/2008 01:04:35 PM EDT Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)1 Requests ∓ ∰]CO/NXX Code Requests Your Utilization calculates to 74.854%. The FCC required the utilization of 75.000%. ∔ թվConfirm Resources You have requested more blocks than you will exhaust in six months. In Service + 🗓 Donate Blocks ± 🖺 Search Forms **Select One Option and Submit** ± 🖺 Reports Return to the Months To Exhaust Form + 🖺 User Profile Need to request a State Waiver Received a State Waiver Submit Cancel Question? Email us © 1997-2012 NeuStar, Inc. Legal Notice

STATE OF SOUTH CAROLINA)	
)	CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)	

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for AT&T South Carolina ("AT&T") and that she has caused AT&T's Petition for Review of NXX Code Denial in the Seneca Rate Center to be served by the method indicated below upon the following this April 24, 2008:

Thomas C. Foley
Sr. NPA Relief Planner – Eastern Region NANPA
NeuStar – NANPA
820 Riverbend Blvd.
Longwood, FL 32779-2327
(U. S. Mail)

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